

1 BOIES, SCHILLER & FLEXNER LLP
William A. Isaacson (*admitted pro hac vice*)
2 wisaacson@bsfllp.com
David Boyd (*admitted pro hac vice*)
3 dboyd@bsfllp.com
Jennifer Milici (*admitted pro hac vice*)
4 jmilici@bsfllp.com
Melissa B. Willett (*admitted pro hac vice*)
5 mwillett@bsfllp.com
5301 Wisconsin Ave., Suite 800
6 Washington, DC 20015
Telephone: 202-237-2727
7 Facsimile: 202-237-6131

8 David L. Zifkin (SBN 232845)
dzifkin@bsfllp.com
9 401 Wilshire Blvd., Suite 850
Santa Monica, CA 90401
10 Telephone: 310-752-2400
Facsimile: 310-752-2490

11 BIRD, MARELLA, BOXER, WOLPERT, NESSIM, DROOKS
& LINCENBERG, P.C.
12 Terry W. Bird (SBN 49038)
13 twb@birdmarella.com
1875 Century Park East, 23rd Floor
14 Los Angeles, CA 90067
Telephone: 310-201-2100
15 Facsimile: 310-201-2110

16 Attorneys for Plaintiff

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA
19 SOUTHERN DIVISION
20

21 InfoSpan, Inc.,

22 Plaintiff,

23 v.
24

25 Emirates NBD Bank PJSC,

26 Defendant.
27
28

Case No. 8:11-CV-01062 JVS (ANx)

**DECLARATION OF NANDAN
PADMANABHAN IN SUPPORT OF
EX PARTE APPLICATION TO
MODIFY THE SCHEDULE**

DECLARATION OF NANDAN PADMANABHAN

I, Nandan Padmanabhan, an attorney admitted to practice in the State of California, declare as follows:

1. I am an Associate at the law firm of Boies, Schiller & Flexner LLP, and counsel to Plaintiff InfoSpan, Inc. I make this declaration in support of Plaintiff's *ex parte* application to modify the expert discovery schedule, filed concurrently herewith. I have personal knowledge of the facts set out below, and could and would testify competently to those facts if called upon to do so.

2. Attached hereto as Exhibit A is a true and correct copy of a letter sent by me, Nandan Padmanabhan, to Defendant's Counsel, Reza Mirzaie, dated November 15, 2013.

3. Attached hereto as Exhibit B is a true and correct copy of a letter sent by me, Nandan Padmanabhan to Mr. Mirzaie dated November 21, 2013.

4. Attached hereto as Exhibit C is a true and correct copy of an email sent by Mr. Mirzaie to me, Nandan Padmanabhan, on November 13, 2013 at 5:51 p.m.

5. Attached hereto as Exhibit D is a true and correct copy of an email sent by Defendant's Counsel, Baraa Kahf, to me, Nandan Padmanabhan, and to Mr. Mirzaie on November 19, 2013 at 1:05 p.m.

6. Attached hereto as Exhibit E is a true and correct copy of my colleague Jennifer Milici's letter to Mr. Mirzaie dated November 18, 2013.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed this 22nd day of November, 2013 in Santa Monica, California.



Nandan Padmanabhan